

*Law Office Of*

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**Via ECF**

August 15, 2019

The Honorable Paul G. Gardephe  
United States District Judge  
Southern District of New York  
New York, New York 10007

Re: *United States v. Fredy Renan Najera Montoya*  
15-cr-378 (PGG-1)

Dear Judge Gardephe:

The Defendant, Fredy Renan Najera Montoya, respectfully requests with the consent of the government's counsels, that the order dated August 5, 2019 (Document 118) be amended permitting the Defendant to submit a letter by Monday, August 26, 2019, and indicate whether defendant is asserting actual innocence with respect to Count One of the Superseding Indictment. The government will submit a reply by September 9, 2019, stating whether it wishes to litigate the Defendant's motion to withdraw his guilty plea or proceed to trial.

Please respectfully advise if this proposed schedule is acceptable to the Court.

Respectfully submitted,

/s/ Joaquin Perez /  
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cc: Matthew J. Laroche, AUSA  
Emil J. Bove, III, AUSA  
(Via ECF)